



City of Rockville  
111 Maryland Avenue  
Rockville, Maryland  
20850-2364  
www.rockvillemd.gov

Mayor & Council  
240-314-8280  
TTY 240-314-8137  
FAX 240-314-8289

March 31, 2009

Royce Hanson, Chairman  
Montgomery County Planning Board  
The Maryland-National Capital Park and Planning Commission  
8787 Georgia Avenue  
Silver Spring, Maryland 20910

Re: Written Testimony from the City of Rockville on Public Draft of Gaithersburg West Master Plan

Dear Chairman Hanson:

The purpose of this letter is to submit comments from the City of Rockville as Written Testimony on the Public Draft of the Gaithersburg West Master Plan.

First, I would like to express Rockville's sincere appreciation to your staff for coming to City Hall on March 9, 2009 to brief the Mayor and Council on the Plan. Nancy Sturgeon, Glenn Kreger, Sue Edwards and Eric Graye were extremely informative.

In general, Rockville supports the long-term economic benefits of the Life Sciences Center (LSC), which will be highly beneficial to Rockville residents in terms of job creation, health care and educational opportunities. Rockville agrees with the approach of the Draft Plan, to take a strong and forward-looking approach by embracing and leveraging key regional assets that distinguish this portion of Montgomery County from other regions of the country and the world, including NIH, NIST, FDA, Johns Hopkins University and the University of Maryland at Shady Grove, Montgomery College, and Adventist Healthcare.

The City also supports the enhanced approach to both multi-modal transportation and public amenities, including the explicit incorporation of pedestrian and bicycle infrastructure. The City particularly applauds the inclusion of connectivity of the proposed LSC Loop and other multi-modal trails to the Rockville, Gaithersburg and Montgomery County systems. By doing so, the Draft Plan is attempting to incorporate key quality-of-life components into an area that is being recommended for a great increase in density, rather than having those demands be served elsewhere in nearby communities such as Rockville.

The City of Rockville has areas of concern, however, which we believe must be addressed.

#### Development Totals and Phasing

The Draft Plan proposes a total of 20 million square feet of nonresidential development and 8,000 dwelling units, in the summary table of development, entitled

MAYOR  
Susan R. Hoffmann

COUNCIL  
John B. Britton  
Piotr Gajewski  
Phyllis Marcuccio  
Anne M. Robbins

CITY MANAGER  
Scott Ullery

CITY CLERK  
Claire F. Funkhouser

CITY ATTORNEY  
Debra Yerg Daniel

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"Life Sciences Center: Existing and Proposed Development" (p. 21). This table shows that the plan would permit an additional 7.075 million square feet of commercial space, beyond the 12.925 million that is currently permitted. This addition does not appear to be consistent with the square footages discussed in the Staging Requirements, which the Draft Plan discusses on pages 62 and 63. In that section, it appears that 9 million square feet of additional commercial space would be permitted, which Park and Planning staff confirmed in a conversation with City staff. In order to understand the level of the development proposed, and the resultant impacts, it is crucially important that these numbers be clarified and reconciled.

With respect to the Staging Requirements themselves, they link permission of development to certain actions. The City of Rockville is concerned that too many of the actions involving real infrastructure development are deferred to Stage 3, especially considering that two-thirds of the additional commercial development is proposed for Stage 2. We would like to see additional public investments in public transportation and roads, as well as other public amenities, as part of the plan for Stage 2 so that the large increase in recommended development can be properly accommodated.

In addition, at present the Staging Requirements do not include requirements for the development of the residential units. The City believes strongly that this link should be made in the plan, so that there is adequate planning for the impacts of thousands of new housing units.

In general, the City also believes that the Plan should describe more specifically the advantages of the proposed level of additional development. The Plan should consider alternative methods of achieving the goals and visions of the Life Sciences Center, which may include revisiting the overall scale of development.

#### Traffic

The City of Rockville supports the approach of adding street network as part of the plan, including the creation of smaller and more walkable blocks. The City also supports the approach of concentrating building heights and densities around new proposed Corridor Cities Transitway (CCT) stations. The logic of building new housing, including affordable options, in close proximity to both the new employment locations and transit will offer the opportunity to reduce the amount of Vehicle Miles Traveled, as compared to what the total would be if the development patterns were different.

We do not believe, however, that the Draft Plan adequately accounts for and manages the negative impacts of the large amount of new automobile traffic in and out of the planning area. Even the most aggressive of the Draft Plan's targets for alternative modes still anticipates at least 70% of new employees and residents using automobiles. Considering the large number of new employment and homes, we

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anticipate both major arterials and secondary roads to be heavily impacted. Arterials of greatest concern to Rockville include Darnestown Road, Key West Avenue, West Montgomery Avenue (MD 28), and the I-270 ramps, in addition to the potential impact on I-270. Secondary roads that must be studied and then managed include Wootton Parkway, Falls Grove Boulevard, Blackwell Road, Watts Branch Parkway and other Rockville streets.

The City believes that the plan needs a greater focus on how to manage and mitigate these impacts, in addition to the Plan recommendations on increasing the non-auto-driver mode share from 16 percent to 30 percent.

#### Transit

The Corridor Cities Transitway (CCT) is at the core of the Draft Plan and, once built, will pass through Rockville in the King Farm neighborhood. The Plan does not anticipate the CCT being operational until at least Stage 3 of the nonresidential development. The City strongly supports the development of the CCT, but the Plan should also consider alternatives should the State not fund the project or approve the Draft Plan's recommended realignment.

#### Open Space

The City supports the Plan's general statements regarding the provision of open spaces, but has the following recommendations regarding open spaces in the Plan:

- Developers should be required to meet at least minimal standards for provision of public open space or publicly accessible open space. A goal of 12 acres per 1,000 residential population would be appropriate, as this is the standard set forth by the National Recreation and Park Association.
- Parkland needs to be more than just "civic green spaces." The 15 percent public open space requirement needs to be made up of significantly sized park parcels, not just "urban squares," "urban promenades," stream buffers, and pieces of rights-of-way.
- Parkland should contain approximately 50 percent "developable" land for recreational amenities. The remainder can be forested stream valley and/or other "passive" open space to accommodate the recreational demands of the adults and the children who will occupy the 4,200 additional residential units.
- The preferred scenario is to dedicate public parkland to the MNCPPC, as that approach will provide greater insurance that the properties will be maintained over the long term.
- The Plan should include stronger language requiring developers and institutions to work with the Cities of Gaithersburg and Rockville to improve connectivity.

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Other Public Amenities

The Draft Plan recognizes and plans for needs in the areas of schools, open spaces, civic spaces, transit and other public services and amenities. It is very important, however, that details on the locations, sizes, and types of facilities be carefully planned and programmed, both to serve the new residents and to minimize the impacts on surrounding communities such as Rockville.

As a final point, the City of Rockville requests that the implementation steps of the Plan, if approved, be coordinated between the County and the City. Examples would include exploring whether there are opportunities for joint policies that will ensure compatible development along the City boundaries, and final decisions on the amount, siting and the type of public facilities, such as community centers, schools, libraries, and others are made in collaboration with the City.

Thank you very much for your attention to this testimony.

Sincerely,



Susan R. Hoffmann  
 Mayor

cc: Councilmember John Britton  
 Councilmember Piotr Gajewski  
 Councilmember Phyllis Marcuccio  
 Councilmember Anne M. Robbins  
 City of Rockville Planning Commission  
 Scott Ullery, City Manager  
 Susan Swift, Director, CPDS  
 David Levy, Chief of Long Planning and Redevelopment  
 Manisha Tewari, Planner II  
 Craig Simoneau, Director of Public Works  
 Emad Elshafei, Chief of Traffic and Transportation  
 Sally Sternbach, Executive Director, REDI  
 Burt Hall, Director of Recreation and Parks  
 Nancy Sturgeon, MNCPPC  
 Sue Edwards, MNCPPC  
 Glenn Kreger, MNCPPC  
 Eric Graye, MNCPPC